

UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF WISCONSIN

In re: Esperanza Unida, Inc.,
Debtor.

Case No. 17-25597-beh
(Chapter 11)

STIPULATION FOR DISMISSAL PURSUANT TO 11 U.S.C. § 1112(b)

Patrick S. Layng, the United States Trustee for the Eastern District of Wisconsin (the “U.S. Trustee”), by and through his attorney, Laura D. Steele, and Piermario Bertolotto, proposed counsel for Esperanza Unida, Inc. (“Debtor”), stipulate as follows:

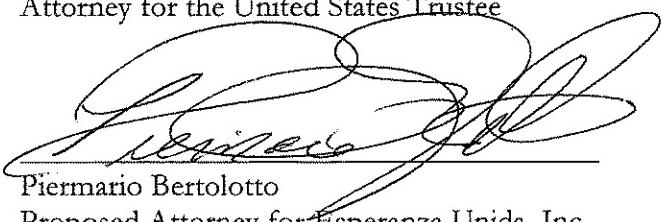
1. Esperanza Unida, Inc. (“Debtor”) commenced this case on June 5, 2017, by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. The U.S. Trustee filed a motion to dismiss this case for cause pursuant to 11 U.S.C. § 1112(b). Docket No. 10.
3. A hearing on the U.S. Trustee’s motion to dismiss is currently scheduled for July 10, 2017.
4. The Debtor moved the Court for a second extension of the deadline for filing its schedules. Docket No. 16.
5. The U.S. Trustee objected to a second extension, and the Court ordered schedules to be filed on or before July 5, 2017. Docket Nos. 18, 19.
6. The Debtor did not file schedules as required by July 5, 2017.

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7. The Debtor stipulates that there is cause to grant the U.S. Trustee's motion for dismissal based upon the reasons stated in the U.S. Trustee's motion and the Debtor's failure to comply with the Court's order to file schedules by July 5, 2017.
8. Therefore, based upon this stipulation, the Debtor and the U.S. Trustee request that the Court enter an order dismissing this Chapter 11 case pursuant to 11 U.S.C. § 1112(b).

7-7-17
Dated: _____

Laura D. Steele
Attorney for the United States Trustee



Piermario Bertolotto
Proposed Attorney for Esperanza Unida, Inc.

Dated: July 7, 2017